

<b>IN RE:</b>	:	<b>CHAPTER 13</b>
<b>HAROLD EUGENE CLARK, SR</b>	:	
<b>aka Harold Eugene Clark</b>	:	<b>CASE NO. 1:17-bk-02060</b>
<b>JACKQYLN DALE CLARK,</b>	:	
<b>Debtors</b>	:	
	:	
<b>HAROLD EUGENE CLARK, SR</b>	:	
<b>aka Harold Eugene Clark</b>	:	
<b>JACKQYLN DALE CLARK,</b>	:	
<b>Movants</b>	:	<b>OBJECTION TO CLAIM # 5</b>
<b>v.</b>	:	
<b>Pinnacle Credit Services, LLC its</b>		
<b>successors and assigns as assignee of</b>		
<b>Cellco Partnership d/b/a Verizon,</b>		
<b>Respondent/Claimant</b>		

5. Rule 3001(c)(2)(A) requires an itemized statement showing all applicable interest, fees, expenses, and/or charges be filed with the proof of claim.

6. Without the required documentation attached to the claim, Debtor's counsel cannot ascertain the claim amount is correct; and which state's statute of limitations applies.

7. If the applicable statute of limitations is Pennsylvania, then the Claimant's claim is beyond the statute of limitations for collection.

8. The Debtor believes that the claim is beyond the statute of limitations for collection and may be overstated, but without further documentation cannot determine the validity of the claim. The attachment to the proof of claim indicates that the last transaction on the account was made on November 13, 2010 and the obligation was charged off on April 13, 2011.

9. Although the Claimant indicates that its claim is for principal only, Debtor believes that the amount includes interest, fees or other charges, which would require the Claimant to comply with Rule 3001(c)(2)(A) and provide a breakdown of the additional fees and charges.

10. The claim should be disallowed because the claim is beyond the statute of limitation for collections.

WHEREFORE, the Debtor hereby requests that this Honorable Court enter an order

1. Disallowing and dismissing the claim; and
2. Precluding the Claimant from presenting the omitted information as evidence in any contested matter or adversary proceeding pursuant to Rule 3001(c)(2)(D)(i); and
3. Granting such other relief as this Court deems just.

Respectfully submitted,

/s/ Dorothy L. Mott

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<b>Respondent/Claimant</b>	:	

**NOTICE OF OBJECTION TO CLAIM AND HEARING DATE** Harold Eugene Clark, Srand Jackqyln Dale Clark have filed an objection to the proof of claim you filed in this bankruptcy case. Your claim may be reduced, modified, or eliminated. You should read these papers carefully and discuss them with your attorney, if you have one. If you do not want the court to eliminate or change your claim, you or your lawyer must attend the hearing on the objection, scheduled to be held:

If you or your attorney do not attend the hearing on the objection, the court may decide that you do not oppose the objection to your claim. Attorney for Objector

Date of Notice: August 24, 2017

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<b>Respondent/Claimant</b>		

I, the undersigned, hereby certify that on August 24, 2017, I served a copy of the foregoing document(s) electronically or by placing the same in the United States Mail, First Class, postage pre-paid, addressed as follows on the following parties:

Name and Address	Mode of Service
CHARLES J DEHART, III ESQUIRE 8125 ADAMS DRIVE SUITE A HUMMELSTOWN PA 17036 <a href="mailto:dehartstaff@pamd13trustee.com">dehartstaff@pamd13trustee.com</a>	Electronically
PINNACLE CREDIT SERVICES C/O RESURGENT CAPITAL SERVICES PO BOX 10587 GREENVILLE, SC 29603-0587	First Class Mail, Postage Prepaid

/s/Dorothy L Mott

Case 1:17-bk-02060-HWV Doc 24 Filed 08/24/17 Entered 08/24/17 08:30:48 Desc  
Main Document Page 5 of 6

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<b>JACKQYLN DALE CLARK,</b>	:	
<b>Movants</b>	:	<b>OBJECTION TO CLAIM # 6</b>
<b>v.</b>	:	
<b>Pinnacle Credit Services, LLC its</b>	:	
<b>successors and assigns as assignee of</b>	:	
<b>Cellco Partnership d/b/a Verizon,</b>	:	
<b>Respondent/Claimant</b>	:	